

From: [Chu, Xiangyu](#)
To: [Celto, Emily A. \(ECY\)](#)
Subject: RE: Huntwood
Date: Thursday, December 10, 2020 2:47:00 PM

Thank you Emily, this information is very useful for my case. Huntwood clearly has a history of noncompliance and the information you provided establishes a lack of cooperation from the facility to comply with RCRA regulation.

From: Celto, Emily A. (ECY) <ECEL461@ECY.WA.GOV>
Sent: Thursday, December 10, 2020 1:48 PM
To: Chu, Xiangyu <Chu.Xiangyu@epa.gov>
Subject: RE: Huntwood

Hi Xiangyu,

I have been reviewing the Huntwood correspondence and RCRA Info information.

After each inspection, listed in RCRA Info, it took a lot of correspondence and, in 2013 (10/1/13) an email mentioning they were on the path to formal enforcement, possibly, because of their lack of response. They eventually submitted what was needed.

In the most recent inspection documentation, their response was inadequate and I sent a letter requesting more information on designation on 10/4/17. I didn't hear anything back. That was the last correspondence about the 2017 report.

I have reviewed the hard copy file and have not found anything additional indicating a return to compliance. They still have a number of outstanding items from that inspection, as indicated in RCRA Info.

Emily

From: Chu, Xiangyu <Chu.Xiangyu@epa.gov>
Sent: Monday, November 16, 2020 1:45 PM
To: Celto, Emily A. (ECY) <ECEL461@ECY.WA.GOV>
Subject: Huntwood

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Hello Emily,

I hope this email finds you well. I work with Cheryl Willams and I'm the assigned case officer for the above facility. I reviewed the August 22, 2017 Notice to Comply letter you sent to the facility for the 8/8/17 inspection. Did the facility respond to the Notice and certify compliance? If they did, can you send me their response.

Also, I have a question regarding their SAA mixing room. As I understand it, all five-gallon container of waste solvent from gun washing SAA are brought to this area, either at the end of a shift or when the 5-gallon container are full. It appears, in this mixing room, the containers are not located at or near the point of generation and are not under the control of the operator of the process where the waste were initially generated. I like to recommend the facility manage this mixing room under the less than 90-day CAA requirements. I want to run this by you and I like to know your thoughts on this recommendation and if Ecology has a different position regarding how wastes are managed in SAA.

Best Regards,

Xiangyu Chu

Region 10

Enforcement and Compliance Assurance Division

EPA Region 10

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